

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BOSE CORPORATION,

Plaintiff,

v.

KOSS CORPORATION,

Defendant.

Civil Action No. 1:20-cv-12193-RGS

JOINT MOTION FOR STAY

Plaintiff Bose Corporation (“Bose”) and Defendant Koss Corporation (“Koss”), by and through their undersigned counsel, respectfully request that the Court stay this case. As grounds for their motion to stay, the parties state:

On July 22, 2020, Koss filed suit against Bose in the Western District of Texas alleging infringement of the same patents at issue in this declaratory judgment action. *Koss Corporation v. Bose Corporation*, Civil Action No. 6:20-cv-00661-ADA (W.D. Tex.) (the “WDTX action”).

On December 17, 2020, Bose moved to dismiss the WDTX action for improper venue and preferably to transfer the WDTX action to the District of Massachusetts. That motion remains pending.

The parties respectfully request a stay of this action while the Western District of Texas considers Bose’s motion. The parties propose to update this Court promptly after receiving a decision from the Western District of Texas on Bose’s motion.

Should the WDTX action be transferred to the District of Massachusetts, Koss reserves the right to request consolidation of the instant case and the WDTX case with the WDTX case designated as the lead case.

Respectfully Submitted,

/s/ Michael N. Rader

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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Dated: February 5, 2021

/s/ Michael N. Rader

Michael N. Rader